

Virginia Board of Pharmacy

RECOMMENDATIONS FOR THE USE OF CONFIDENTIAL CONSENT AGREEMENTS AND PRE-HEARING CONSENT ORDERS IN CASES OF PRACTICE WITHOUT A REQUIRED LICENSE OR REGISTRATION

The following recommendations for use of confidential consent agreements (CCA) and pre-hearing consent orders are in addition to the recommended sanctions in *Guidance Document 110-26 Inspection Violations-Suggested Sanctions*.

Practicing without a required license or registration:

- For matters involving a pharmacist or pharmacy technician who has practiced on an expired license or registration for less than six months (December 31st through June 30th), a CCA may be offered. If the practice exceeds six months, the matter may be referred for a recommended pre-hearing consent order or for informal conference.
- For matters involving an unregistered person performing tasks restricted to pharmacy technicians when that person is not properly in an approved training program, a pre-hearing consent order may be offered to the pharmacist-in-charge for a reprimand and a monetary penalty of \$250. A pre-hearing may also be offered to the unregistered person, if he or she applies for registration, for a reprimand and a monetary penalty of \$50. Subsequent matters involving the same conduct may be referred for an informal conference.